

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products Liability Litigation	MDL NO. 2:15-md-02641-PHX-DGC  <b>STIPULATION OF DISMISSAL WITHOUT PREJUDICE</b>
This document relates to the cases listed on the Exhibit attached hereto.	

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Plaintiffs whose cases are listed on Exhibit A attached hereto (“Plaintiffs”) and Defendants C.R. Bard, Inc. and Bard Peripheral Vascular, Inc. (“Defendants”), and file this Stipulation of Dismissal without Prejudice, and in support thereof, respectfully show the Court as follows:

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs and Defendants hereby stipulate to the dismissal of the cases listed on Exhibit A without prejudice to the re-filing of same. Plaintiffs and Defendants further stipulate that they are to bear their own costs.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defendants hereby respectfully request that the Court dismiss the cases listed on Exhibit A in their entirety without prejudice to the re-filing of same and order that these parties are to bear their own costs.

Respectfully Submitted,

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**ATTORNEY FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

I hereby certify that on December 19, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

s/ Brandon L. Rich  
Brandon L. Rich

## EXHIBIT "A"

<b>Member Case Number</b>	<b>Full Name of Plaintiff</b>	<b>Date Answer Filed (If applicable)</b>
2:19-cv-03770-DGC	Mark Schmolke	7/1/19
2:19-cv-03761-DGC	William Seaver	6/27/19
2:19-cv-03783-DGC	Thomas Tsaldaris	7/3/19
2:19-cv-04044-DGC	Leonard Whitted	7/3/19
2:19-cv-03775-DGC	John Hamilton	
2:19-cv-04030-DGC	John McCormick	